

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AUDREY ARPIE, on behalf of herself and all others similarly situated,

Plaintiffs,

v.

Civil Action No.: 3:22-CV-30096-ADB

UKG, INC., MERCY MEDICAL GROUP, INC., and TRINITY HEALTH OF NEW ENGLAND CORPORATION, INC.,

Defendants.

UKG, INC.’S NOTICE OF SETTLEMENT

Defendant UKG, Inc. respectfully submits this Notice to inform the Court of a recent class-action settlement impacting claims raised by Plaintiff Audrey Arpie, and states as follows:

1. On April 12, 2023, UKG executed a Settlement Agreement and Release (the “California Settlement”) with Plaintiffs William Muller, Antonio Knezevich, Adam Bente, and Cindy Villanueva (the “California Plaintiffs”) in the matter *In re UKG Inc. Cybersecurity Litigation*, Master Docket No. 3:22-cv-00346-SI (N.D. Cal.) (the “California Action”).

2. The claims asserted by California Plaintiffs in the California Action were based on the same December 2021 cybersecurity incident that gives rise to Plaintiff’s claims here and the California Plaintiffs’ claims overlap with many of the claims made in this lawsuit.

3. The California Action was brought on behalf of a nationwide class of individuals whose data was stored in the Kronos Private Cloud at the time of the December 2021 cybersecurity incident that encompasses the class Plaintiff seeks to represent here.

4. Once approved, the California Settlement will release claims raised by Plaintiff and the putative class in this action.

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5. Defendants and the California Plaintiffs will file a motion for preliminary approval in the California Action by April 28, 2023, at which time Defendants will submit a copy of the Settlement Agreement to this Court.

Dated: April 13, 2023

Respectfully submitted,

UKG, INC.

By: /s/ Alan Y. Wong
Alan Y. Wong (BBO# 687618)
awong@shb.com
SHOOK, HARDY & BACON L.L.P.
One Federal St., Ste. 2540
Boston, MA 02110
Tel: (617) 531-1411 | Fax: (617) 531-1602

Alfred J. Saikali (PHV0178195FL)
asaikali@shb.com
SHOOK, HARDY & BACON L.L.P.
201 South Biscayne Blvd., Ste. 3200
Miami, FL 33131
Tel: (305) 358-5171 | Fax: (305) 358-7470

Maveric Ray Searle (PHV6336731IL)
msearle@shb.com
SHOOK, HARDY & BACON L.L.P.
111 S. Wacker Drive, Ste. 4700
Chicago, IL 60606
Tel: (312) 704-7700 | Fax: (312) 558-1195

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non-registered participants on April 13, 2023.

D. Greg Blankinship (Mass. Bar #655430)
 Jeremiah Frei-Pearson (pro hac vice)
Finkelstein, Blankinship, Frei-Pearson & Garber, LLP
 One North Broadway, Suite 900
 White Plains, NY 10601
 Tel.: (914) 298-3281
gblankinship@fbfglaw.com
jfrei-peerson@fbfglaw.com

Robert W. Pritchard, PA Bar No. 76979
 (Pro Hac Vice)
 Sarah J. Miley, PA Bar No. 314830
 (Pro Hac Vice)
 Sean Dawson, PA Bar No. 326085
 (Pro Hac Vice)
Littler Mendelson, P.C.
 625 Liberty Avenue, 26th Floor
 Pittsburgh, PA 15222
 Tel: (412) 201-7628
rpritchard@littler.com
smiley@littler.com
sdawson@littler.com

Jack J. Canzoneri (BBO #564126)
McDonald Lamond Canzoneri
 352 Turnpike Rd., Suite 210
 Southborough, MA 01772
 Tel.: (508) 485-6600
jcanzoneri@masslaborlawyers.com

Shea A. Miller, Bar No. 699326
Littler Mendelson, P.C.
 One International Place, Suite 2700
 Boston, MA 02110
 Telephone: 617.378.6000
samiller@littler.com

/s/ Alan Y. Wong
 Alan Y. Wong